REMARKS

Reconsideration and withdrawal of the rejections set forth in the abovementioned Office Action in view of the foregoing amendments and the following remarks are respectfully requested.

Claims 1 through 37, 39 and 40 are pending, with Claims 1, 11, 17, and 27 being independent. Claims 1, 11, 17, and 27 have been amended herein. Support for the amendments to the claims can be found in the specification at least at page 1, lines 10-14.

Claims 1-37 and 39 and 40 were variously rejected under 35 U.S.C. §§ 102 and 103 under the article "Polymap: A Versatile Client-Side Image Map for the Web" (Ang et al.), U.S. Patent Appln. Publication No. 2002/0105531 A1 (Niemi) and the Background section of Applicant's specification. These rejections are traversed.

Ang et al. relates to facilitating interactivity of the World Wide Web by allowing a browser user to access URLs associated with objects within an inline image merely by clicking directly on the image. In particular, polygon map data is included in an image. In Ang et al., there is no management function implemented in a computer-executable language for navigation in the image, as is recited in the independent claims. Nor does Ang et al. disclose or suggest defining at least one zoomable area in an image, with the zoomable area being defined by characteristics of location of the area in the image and for which additional data defining the image at a greater quality or resolution are available, as is also recited in the independent claims.

Thus, <u>Ang et al.</u> fails to disclose or suggest important features of the present invention recited in the independent claims.

As discussed previously, the metadata in <u>Niemi</u> provides neither a description nor a suggestion of at least one management function implemented in a computer-executable language for navigation in the image, as is recited in the independent claims.

Nor does <u>Niemi</u> describe defining at least one zoomable area in the image, with the zoomable area being defined by characteristics of location of the area in the image and for which additional data defining the image at a greater quality or resolution are available, as is also recited in the independent claims. Thus, <u>Niemi</u> also fails to disclose or suggest the important features of the present invention recited in the independent claims.

The Background section of Applicant's specification describes various file types. However, such is not believed to remedy the deficiencies of the citations noted above with respect to the independent claims.

Thus, Claims 1, 11, 17, and 27 are patentable over the citations of record. Reconsideration and withdrawal of the § 102 and § 103 rejections are respectfully requested.

For the foregoing reasons, Applicant respectfully submits that the present invention is patentably defined by independent Claims 1, 11, 17, and 27. Dependent Claims 2-10, 12-16, 18-26, 28-37, 39 and 40 are also allowable, in their own right, for

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defining features of the present invention in addition to those recited in their respective

independent claims. Individual consideration of the dependent claims is requested.

Applicant submits that the present application is in condition for allowance.

Favorable reconsideration, withdrawal of the rejections set forth in the above-noted Office

Action, and an early Notice of Allowability are requested.

Applicant's undersigned attorney may be reached in our Washington, D.C.

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Respectfully submitted,

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